

## Gunter, Jason

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**From:** Gunter, Jason  
**Sent:** Tuesday, July 29, 2014 11:06 PM  
**To:** Mark Nations  
**Subject:** FW: leadwood surface water plan  
**Attachments:** surface water management DRAFT.docx

Mark,

I am forwarding these comments from the state on your surface water management plan at Leadwood. I thought you might want to take a look at these while I get mine finalized. Mine will be minimal and will be sent to you electronically on Thursday. I apologize for the delay, my wife had a baby girl last Thursday and I hadn't got back to it recently. I'll get it to you this week.

Thanks,

Jason

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Superfund

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July 24, 2014

Mr. Jason Gunter  
Remedial Project Manager  
U.S Environmental Protection Agency  
Region 7 – Superfund Branch  
11201 Renner Blvd.  
Lenexa, KS 66219

RE: Surface Water Management Plan for the Leadwood Mine Tailings Superfund Site in St. Francois County, Missouri

Dear Mr. Gunter:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP), Superfund Section has reviewed the "Surface Water Management Plan for the Leadwood Mine Tailings Superfund Site in St. Francois County, Missouri " dated July, 2014. The following comments are provided for your consideration.

1. Regarding typographical errors, be sure to use the spell check the entire document because multiple errors were identified.
2. Page 7, Section 2.1.1, Low Permeability Area, Paragraph 2 states: "The addition of soil cover for this area is intended to minimize infiltration and promote runoff rather than infiltration of any precipitation into the existing tailings". If a 12 inch soil application is being used for the purpose of minimizing infiltration but promoting runoff, then this area may have post removal site control and Operation & Maintenance issues in the future due to erosion from runoff during rain events. It is our understanding that this should be an inspection issue outlined in either the Post Removal Site Control Plan or an O&M Plan.
3. Page 7, Section 2.1.1, Low Permeability Area, Paragraph 2 states: "Completion of this work will include the clearing and grubbing of vegetation that is growing on the tailings in this area". This sentence is very vague and does not indicate what location/locations this cleared material will be disposed of. Explanation of why and to what extent clearing and grubbing of existing vegetation is necessary for this project should be included. If it is necessary, it is our understanding that "vegetation" includes ground cover, trees and brush, and this cleared and grubbed vegetation will be disposed of at the sugar bowl and placed in the disposal area. This sentence does not indicate whether this cleared and grubbed vegetation will be burned in accordance with applicable state, federal, and local regulations. Also, if burning is not an option due to certain circumstances, would mechanical chippers be used for trees and brush? This sentence needs further clarification, stating exactly what location this cleared vegetation will be disposed of, if it will be burned, or if mechanical chippers will utilized for disposal purposes.
4. Page 8, Section 2.1.1, Low Permeability Area, Paragraph 3 states: "The source area for the cover soil is anticipated to be one of a couple of onsite areas that are relatively close

to the East Seep and Erosion Area". It is unclear exactly what locations for onsite soil source areas that this sentence is referring to. Also, is any kind of soil sampling being conducted for the soil coming from these multiple source areas to verify if the source areas are clean and acceptable for use as cover soil onsite? Please include this information in the plan giving the locations of where the soil sources are coming from and if any kind of sampling will be conducted before using as a cover soil.

5. Page 8, Section 2.1.2, Grading, Surface Water Collection, and Monitoring, Paragraph 1 states: "The rock used for erosion control in the channel will conform to standard Missouri Department of Transportation (MoDOT) Type 2 Rip-rap specifications". It is unclear where this rock that will be utilized on site for erosion control in the newly constructed channel is coming from. It is the Department's understanding that it will be coming from Lead Belt Materials because of the close proximity to the site? Please include this information in the plan.

Thank you for the opportunity to review and comment on the aforementioned document. If you have any further questions regarding this letter, please do not hesitate to contact me at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65101-0176, by telephone at (573) 526-4208, or by email at [brandon.wiles@dnr.mo.gov](mailto:brandon.wiles@dnr.mo.gov)

Sincerely,

HAZARDOUS WASTE PROGRAM

Brandon Wiles  
Project Manager  
Superfund Section

BW:jg